U.S. EPA REGION VIII
TECHNICAL ENFORCEMENT PROGRAM
RCRA CORRECTIVE ACTION ASSESSMENT REPORT

Facility:	ASARCO East Helena Plant 100 Smelter Road East Helena, MT
Facility Contact:	Jon Nickel Environmental Manager
Telephone Number:	(406) 227-4529
EPA I.D. No.:	MTD006230346
Notification Status:	LQG
Inspection Type:	Corrective Action Assessment Inspection
Date:	March 7, 2007
Time In:	8:35 a.m.
Time Out:	1:02 p.m.
Weather:	Cool
EPA Representative:	Linda Jacobson EPA Inspector
State Representative:	Iver Johnson MDEQ Inspector
Facility Representatives:	Jon Nickel, Environmental Manager Bob Miller, Hydrogeologist

Background:

This inspection was a prearranged corrective action assessment inspection. Ms. Jacobson, EPA inspector, and Mr. Johnson, Montana Department of Environmental Quality (MDEQ) inspector, arrived at the facility at 8:35 a.m., donned protective gear, and joined Mr. Nickel and Mr. Miller in the employee lunch room. Admittance to the site was gained by consent as noted on the attached Notice of Inspection (NOI) form (Attachment 1). Attached photographs were taken to document the progress of the structure demolition for installation of a source control measure at the former Speiss/Dross Plant area, storage conditions, and corrective action activities.

Pursuant to a 1998 federal RCRA Consent Decree ("CD"), EPA is the lead agency for implementation of corrective action activities at the ASARCO East Helena smelter facility. Ms. Jacobson presented an overview of the scope of the inspection. Additionally, she discussed the areas which she requested to view during the field portion of the inspection including the following: 1) PRB wall and the resistivity project; 2) Former APSD Area temporary cap; 3) temporary caps for other demolished areas; 4) location of proposed haul roads for the waste transfer to the proposed CAMU Phase II Cell; 5) remaining structures in the Speiss/Dross Plant area needing to be cleared for construction of the source control measure in 2007; 6) location of the cadmium/lead plume source area; 7) location of wells to be used for trace metal analyses during May 2007 sampling event.

A meeting among MDEQ, ASARCO, and EPA representatives had occurred on the previous day regarding design, construction, waste placement, long-term monitoring and maintenance of a second corrective action management unit (CAMU) cell for disposal of demolition debris and remediation wastes. Discussion of some of the issues from the prior day continued during the inspection, including approval of the second CAMU cell in phases to avoid extensive delay of the construction and operation of the cell during 2007.

Mr. Johnson proposed use of alternative buildings for storage of demolition debris for structures targeted for removal during 2007. One alternative proposed by Mr. Johnson was the use of the deep truck bins in the ore storage building, which could be used if ramps were constructed into the bins. A second alternative suggested was the use of the Direct Smelt Building for storage of material such as the wood from the Highline trestle.

Mr. Johnson and Mr. Nickel also clarified for Ms. Jacobson that the wastes currently in storage would be placed into the CAMU first. It is ASARCO's intention to place the 2007 demolition wastes directly into the CAMU, without any prior storage.

Ms. Jacobson asked about the leachate sump/leak detection modifications for the new CAMU cell design. Mr. Nickel first showed, then provided Ms. Jacobson, a copy of the drawings which are part of the bid package for the demolition work and CAMU Phase II Cell construction for 2007. Mr. Nickel also clarified that the underground piping located in the structures to be demolished this year would be filled in completely. Mr. Miller further clarified that the pipes were to be filled with a flowing cement-like grout.

Ms. Jacobson reviewed the Interim Cap Inspection Checklist for inspections conducted on January 9, 2007 and February 6, 2007, for the temporary caps which had been constructed over the footprints of the demolished structures to prevent creation of preferential pathways for groundwater and precipitation events.

Physical Site Inspection

A walkthrough was conducted of a portion of the plant to allow photographic documentation of the condition of the pilot-scale PRB, the location and status of the temporary caps, the structures needing to be cleared for installation of the source control measure, structures planned to be demolished in 2007, and alternative storage locations proposed by Mr. Johnson.

Ms. Jacobson spot checked the physical condition of seven of the site wells, checking to see if the casings were vertical, the condition of the well apron and whether the wells were locked and labeled. One of the wells, the ASARCO permeable reactive barrier (PRB) well located next to the slag pile, was not locked. Wells DH-32, DH-37, DH-27, DH-44, DH-40, and DH-33 appeared to be in good physical condition. Well DH-29 was vertical, locked, and labeled but had a crack in the well apron; however, this well is targeted to be properly abandoned this summer.

Ms. Jacobson was also shown the HDS wastewater treatment plant which is operated in a batch mode. Collected stormwater and other site generated waste waters are treated in this system, which has an MPDES discharge permit.

A photo log and photographs are attached to this report as Attachment 2.

Prepared By:

Linda Jacobson

Linda Jacobson, EPA Inspector

April 17, 2007

Date